| 1 2 3 4 5 6 7 | J Christopher Jorgensen Nevada Bar No. 5382 Matthew R. Tsai Nevada Bar No. 14290 LEWIS ROCA ROTHGERBER CHRISTIE LLP 3993 Howard Hughes Pkwy, Suite 600 Las Vegas, NV 89169-5996 Tel: (702) 949-8200 Email: cjorgensen@lewisroca.com Email: mtsai@lewisroca.com Attorneys for Defendant AmeriCredit Corp./General Motors Financial Company, Inc. | |
|---------------------------------|--|--|
| 8 | UNITED STATES DISTRICT COURT | |
| 9 | DISTRICT OF NEVADA | |
| 10 | CYNTHIA L. MUYDERMAN, an individual, | Case No.: 2:20-cv-02172-APG-DJA |
| 11 | Plaintiff, | Compl. Filed: November 27, 2020 |
| 12 | VS. | STIPULATION TO EXTEND |
| 13 14 | GENERAL MOTORS FINANCIAL COMPANY, INC., a foreign corporation; TRANS UNION LLC; a foreign limited- | DEFENDANT AMERICREDIT CORP./GENERAL MOTORS FINANCIAL COMPANY, INC.'S TIME TO RESPOND TO |
| 15 | liability company; | COMPLAINT |
| 16 | Defendant. | (FIRST REQUEST) |
| 17 | | |
| 18 | This Stipulation to extend defendant AmeriCredit Corp./General Motors Financial | |
| 19 | Company, Inc.'s time to respond to complaint is made by and between Plaintiff Cynthia L. | |
| 20 | Muyderman ("Plaintiff") and Defendant AmeriCredit Corp./General Motors Financial Company, | |
| 21 | Inc. ("AmeriCredit/GM") through their respective counsel, in light of the following facts: | |
| 22 | <u>RECITALS</u> | |
| 23 | A. Plaintiff filed the Complaint ("Complaint") against Defendants on or about | |
| 24 | November 27, 2020. | |
| 25 | B. AmeriCredit/GM was served with the Complaint on or about January 28, 2021. | |
| 26 | C. AmeriCredit/GM's current deadline to respond to the Complaint is due March 29, | |
| 27 | 2021. | |
| 28 | D. The parties agree that AmeriCa | redit/GM will have through April 5, 2021, to |

| 1 | respond to the Complaint in order to give AmeriCredit/GM time to investigate Plaintiff's claims | | |
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| 2 | and prepare a proper response, and for the parties to discuss a potential resolution of this matter | | |
| 3 | E. There is good cause to grant this stipulation because AmeriCredit/GM requires | | |
| 4 | additional time to investigate Plaintiff's claims and prepare a proper response, and the parties | | |
| 5 | require additional time to consider a resolution of this matter. | | |
| 6 | F. This stipulation is filed in good faith and not intended to cause delay. | | |
| 7 | G. Pursuant to Local Rule IA 6-2 and Local Rule 7.1, Plaintiff and AmeriCredit/GM | | |
| 8 | respectfully request that the Court extend AmeriCredit/GM's time to respond to Plaintiff's | | |
| 9 | Complaint through April 5, 2021. | | |
| 10 | <u>STIPULATION</u> | | |
| 11 | NOW, THEREFORE, Plaintiff and AmeriCredit/GM hereby stipulate and agree that | | |
| 12 | AmeriCredit/GM has up to and including April 5, 2021, to file a response to Plaintiff's | | |
| 13 | Complaint. | | |
| 14 | IT IS SO STIPULATED. | | |
| 15 | DATED this 30th day of March, 2021 DATED this 30th day of March, 2021 | | |
| 16 | LAW OFFICE OF KEVIN L. HERNANDEZ LEWIS ROCAROTHGERBER CHRISTIE | | |
| 17 | Dry/a/ Varin Hamandar Dry /a/Matthayy Tasi | | |
| 18 | By:/s/ Kevin Hernandez Kevin Hernandez, Esq. Nevada Bar No. 12594 By: /s/ Matthew Tsai J Christopher Jorgensen, Esq. Nevada Bar No. 5382 | | |
| 19 | Nevada Bar No. 12594 Nevada Bar No. 5382 8872 S. Eastern Ave., Suite 270 Matthew R. Tsai | | |
| 20 | Las Vegas, Nevada 89123 Nevada Bar No. 14290 3993 Howard Hughes Pkwy, Suite 600 | | |
| 21 | Attorneys for Plaintiff Las Vegas, NV 89169 Cynthia L. Muyderman | | |
| 22 | Attorneys for Defendant AmeriCredit Corp./General Motors Financial | | |
| 23 | Company, Inc. | | |
| 24 | <u>ORDER</u> | | |
| 25 | IT IS SO ORDERED. | | |
| 26 | | | |
| 27 | United States Magistrate Judge | | |
| 28 | Dated: March 31, 2021 | | |
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